

**Federal Defenders
OF NEW YORK, INC.**

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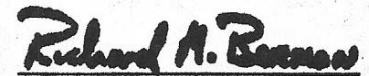
**Application respectfully denied as stated in
court order dated September 6, 2023.**

By ECF

The Honorable Richard M. Berman
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

SO ORDERED:

Date: 9/8/2023



Richard M. Berman, U.S.D.J.

Re: *United States v. Dujohn Willette*,
23 Cr. 37 (RMB), 19 Cr. 196 (RMB), 16 Cr. 790 (RMB)

Dear Judge Berman:

I write in response to the Court's Order addressing Dujohn Willette's motion to dismiss VOSR Specifications 1 and 2 or, in the alternative, schedule a hearing and adjourn sentencing. *See* Dkt. 27, 23 Cr. 37; Dkt. 88, 19 Cr. 196; Dkt. 74, 16 Cr. 790. In that Order, the Court noted its inclination not to dismiss the specifications and stated that the parties should be prepared to address the issues raised by Mr. Willette's motion along with sentencing on September 19, 2023. *Id.*

With the consent of the Government, I respectfully request that the Court adjourn Mr. Willette's sentencing until the conclusion of a VOSR hearing on Specifications 1 and 2. I believe it is in Mr. Willette's best interest, and in the interest of judicial economy, to address his sentencing on all three cases in a single proceeding, with all the relevant issues fleshed out for the Court.

After receiving the Court's Order yesterday, September 6, the parties conferred about the Government's availability for a hearing. As of this evening, the Government is still waiting to hear back from its witnesses regarding their availability.

Respectfully submitted,



Ariel Werner
Assistant Federal Defender
917-751-2050

CC: AUSA Adam Sowlati (by ECF)